

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

Dallas Division

ROBERT HOPKINS, III,	*
	*
Plaintiff,	*
	*
v.	* Civil Action No. 3:22-cv-00706 (E)
	*
DEPARTMENT OF DEFENSE,	*
	*
Defendant.	*
	*

* * * *

**PLAINTIFF'S CONSENT MOTION FOR FURTHER
BRIEF ENLARGEMENT OF TIME WITHIN WHICH
TO FILE HIS OPPOSITION TO DEFENDANT'S MOTION
TO DISMISS AND FOR SUMMARY JUDGMENT**

NOW COMES Plaintiff to respectfully request a final three-day extension, until 14 April 2025, of his deadline for filing his Opposition to Defendant's Motion to Dismiss and for Summary Judgment. He is not requesting an extension of the deadline for filing his cross-motions.

Plaintiff has good cause to request this relief and does so due to factors outside his control. As Plaintiff previously advised the Court, his forthcoming brief will include multiple third-party declarations, and his undersigned counsel learned just this morning that one of the declarants is out of town with no access to a computer until tomorrow and accordingly cannot finalize the declaration today.

The undersigned apologizes to the Court for this last-minute request and does not wish to unduly delay the resolution of this case any further. In furtherance of this goal, Plaintiff still intends to file his cross-motions today, since they do not rely on the declaration in question.

Defendant consents to this Motion. A proposed Order accompanies this Motion.

Date: April 11, 2025

Respectfully submitted,

/s/ Kelly B. McClanahan
Kelly B. McClanahan, Esq.
N.D. Tex. Bar #984704DC
National Security Counselors
1451 Rockville Pike
Suite 250
Rockville, MD 20853
501-301-4672
240-681-2189 fax
Kel@NationalSecurityLaw.org

Counsel for Plaintiff

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing filing contains 294 words.

/s/ Kelly B. McClanahan
Kelly B. McClanahan, Esq.